

BellSouth Florida OSS Testing Evaluation

Date: March 12, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.



BellSouth Florida OSS Testing Evaluation

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non- Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non- Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non- Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non- Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%



BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non- Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%

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	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
31	CLEC; UNE Non-Design	>=10 Circuits; Non- Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

⁴ BellSouth's Response to Observation 32, 01/31/01.



Florida OSS Test Exception 27

April 19, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

	Measurement	Category	KPMG Consulting- Calculated	KPMG Consulting- Calculated	KPMG Consulting- Calculated	BellSouth Reported Value
	4		Numerator	Denominator	Value	Value
1	BST; Residence	<10	4236	55577	7.62%	7.72%
		Circuits;				
		Dispatch				
2	BST; Residence	<10	19999	816701	2.45%	3.06%
		Circuits;				
		Non-				
		Dispatch				
3	BST; Residence	<10	24235	872278	2.78%	10.79%
		Circuits				
4	BST; Residence	>=10	11	101	10.89%	9.80%
		Circuits;				
		Dispatch				
5	BST; Residence	>=10	4834	0	DIV/0	N/A
		Circuits;				
		Non-				
		Dispatch	-			
6	BST; Residence	>=10	4845	101	4797.03%	9.80%
		Circuits				
7	BST; Business	<10	1089	16483	6.61%	6.86%
		Circuits;				
		Dispatch				
8	BST; Business	<10	2166	56070	3.86%	4.36%
		Circuits;				
		Non-				
		Dispatch				
9	BST; Business	<10	3255	72553	4.49%	11.21%
		Circuits				
10	BST; Business	>=10	50	453	11.04%	7.25%
		Circuits;				
		Dispatch				
11	BST; Business	>=10	279	487	57.29%	0.41%
		Circuits;				
		Non-				
12	DCT. Dusi-	Dispatch	220	040	25.000/	7.6604
12	BST; Business	>=10	329	940	35.00%	7.66%
12	DCT. Docion	Circuits	01	6200	1.200/	2.250/
13	BST; Design	<10	81	6289	1.29%	2.35%
		Circuits; Dispatch				
14	BST; Design	<10	82	6794	1.21%	2.55%
1 4	Doi, Design	Circuits	02	0/74	1.2170	4.5570
15	CLEC; Residence	<10	84	1035	8.12%	7.92%
1.5	CLEC, Residence	Circuits;	0**	1033	0.1270	1.7470
		Dispatch				
16	CLEC; Residence	<10	594	14248	4.17%	4.41%
10	CLLC, Residence	Circuits;	J 3-4	17470	7.1/70	7.71/0
		Non-				
		Dispatch				
17	CLEC; Residence	<10	678	15283	4.44%	12.33%
1'	CDDC, Residence	Circuits	076	15205	7.7 7 /0	14.55/0
	<u> </u>	Circuits	<u> </u>			

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%
31	CLEC; UNE Non-Design	>=10 Circuits; Non- Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

Due to additional coding changes to Provisioning: Percent Troubles within 30 days, BellSouth will provide KPMG the April 2001 data when available.



Florida OSS Test Exception 27

May 18, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non- Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non- Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non- Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non- Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%
15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non- Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%

	Measurement	Category	KPMG	KPMG	KPMG	BellSouth
	-		Consulting- Calculated Numerator	Consulting- Calculated Denominator	Consulting- Calculated Value	Reported Value
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%
31	CLEC; UNE Non-Design	>=10 Circuits; Non- Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

Due to additional coding changes to Provisioning: Percent Troubles within 30 days, BellSouth will provide KPMG the April 2001 data when available.

BellSouth Amended Response:

The changes that were originally planned for the May 1st production run (April data) were not implemented. They are scheduled for the June 1st production run (May data). BellSouth suggests that KPMG use the May 2001 data when available.



Florida OSS Test Exception 27

July 5, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

	Measurement	Category	KPMG	KPMG	KPMG	BellSouth
			Consulting-	Consulting-	Consulting-	Reported
			Calculated	Calculated	Calculated	Value
<u></u>			Numerator	Denominator	Value	
1	BST; Residence	<10	4236	55577	7.62%	7.72%
		Circuits;				
		Dispatch				
2	BST; Residence	<10	19999	816701	2.45%	3.06%
}		Circuits;				
		Non-			[
<u></u>		Dispatch				
3	BST; Residence	<10	24235	872278	2.78%	10.79%
		Circuits				
4	BST; Residence	>=10	11	101	10.89%	9.80%
İ	Ė	Circuits;]	
		Dispatch				
5	BST; Residence	>=10	4834	0	DIV/0	N/A
		Circuits;				
		Non-				
		Dispatch				
6	BST; Residence	>=10	4845	101	4797.03%	9.80%
		Circuits				
7	BST; Business	<10	1089	16483	6.61%	6.86%
		Circuits;				
		Dispatch				
8	BST; Business	<10	2166	56070	3.86%	4.36%
		Circuits;				
		Non-				
		Dispatch				
9	BST; Business	<10	3255	72553	4.49%	11.21%
		Circuits				
10	BST; Business	>=10	50	453	11.04%	7.25%
İ		Circuits;				
		Dispatch				
11	BST; Business	>=10	279	487	57.29%	0.41%
		Circuits;				
		Non-				
		Dispatch				
12	BST; Business	>=10	329	940	35.00%	7.66%
		Circuits				
13	BST; Design	<10	81	6289	1.29%	2.35%
		Circuits;				
<u></u>		Dispatch			L	
14	BST; Design	<10	82	6794	1.21%	2.55%
		Circuits		40.7		
15	CLEC; Residence	<10	84	1035	8.12%	7.92%
		Circuits;				
<u></u>	C. D.C. 2	Dispatch			1.5	
16	CLEC; Residence	<10	594	14248	4.17%	4.41%
		Circuits;				
		Non-				
17	CLEC. P. 11	Dispatch	(70	15000	4.4407	10.220/
17	CLEC; Residence	<10	678	15283	4.44%	12.33%
		Circuits				

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
18	CLEC; Residence	>=10 Circuits;	25	0	DIV/0	N/A
		Non-				
		Dispatch				
19	CLEC; Residence	>=10	25	3	833.33%	N/A
	GT DG D	Circuits				= ====
20	CLEC; Business	<10	27	431	6.26%	7.19%
		Circuits; Dispatch				
21	CLEC; Business	<10	112	2387	4.69%	5.01%
	CDDC, Dusmess	Circuits;	112	2307	1.0570	3.0170
		Non-				
		Dispatch				
22	CLEC; Business	<10	139	2818	4.93%	12.21%
		Circuits				
23	CLEC; Business	>=10	5	6	83.33%	16.67%
		Circuits; Dispatch				
24	CLEC; Business	>=10	4	13	30.77%	7.69%
	0220, 2233000	Circuits;				
		Non-				
		Dispatch				
25	CLEC; Business	>=10	9	19	47.37%	24.36%
26	OLEG D	Circuits			1.000/	1.008/
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE	<10	31	1245	2.49%	13.64%
	Design	Circuits;	J.	1243	2.4570	15.0470
,		Dispatch				
28	CLEC; UNE	<10	31	1245	2.49%	13.64%
	Design	Circuits				
29	CLEC; UNE	<10	14	1048	1.34%	1.43%
	Non-Design	Circuits; Non-				
		Non- Dispatch				
30	CLEC; UNE	<10	14	1582	0.88%	1.43%
	Non-Design	Circuits			3.5575	2
31	CLEC; UNE	>=10	1	26	3.85%	N/A
	Non-Design	Circuits;				
		Non-				
	CLEC TRUE	Dispatch		40	2.049/	27/4
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A
	Mon-Design	Circuits			Ll	

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SOM may be in question. Without accurate SOMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Amended Response:

The changes that were originally planned for the June 1st production run (May data) were not implemented. They are scheduled for the July 1st production run (June data).



Florida OSS Test Exception 27

August 17, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

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SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

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As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The PMAP Raw Data User Manual includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

Calculated Calculated Calculated Calculated Calculated Calculated Calculated Calculated Value Calculated Calculated Calculated Calculated Calculated Calculated Value Calculated Calcula		Measurement	Category	KPMG	KPMG	KPMG	BellSouth
Calculated Numerator				Consulting	Consulting-	Consulting	Reported
Numerator Numerator Residence Circuits; Dispatch				- Calbulatad	[1] B. A. Shend, M. S. A. M. Handi, R. S. S. S. S. M. M. M.		Value
BST; Circuits; Dispatch D						[8] S. M. Maring, Phys. Rev. Rev. 10, 110 (1997).	
Dispatch 2 BST; Circuits; Non-Dispatch 2 BST; Circuits; Non-Dispatch 2 BST; Circuits; Non-Dispatch 2 BST; Circuits Circuits; Dispatch 2 BST; Residence Circuits; Non-Dispatch 2 BST; Business Circuits; Dispatch 2 BST; Design Circuits; Dispatch Dispat	1	BST;	<10		55577		7.72%
Residence Circuits; Non-Dispatch ST; Residence Circuits; Non-Dispatch ST; Residence Circuits Circuits; Non-Dispatch ST; Residence Circuits; Non-Dispatch ST; Residence Circuits; Non-Dispatch ST; Residence Circuits; Non-Dispatch ST; Residence Circuits; Non-Dispatch ST; Business CIO Circuits; Non-Dispatch Circuits; Non-Dispatch ST; Business CIO Circuits; Non-Dispatch Circuits; Non-Dispa		Residence					
Residence							
Non-Dispatch ST; Circuits Circuits ST; S=10 Circuits; Dispatch ST; S=10 Circuits; Dispatch ST; S=10 Circuits; Dispatch ST; S=10 Circuits; Dispatch ST; S=10 Circuits; Non-Dispatch ST; BST; S=10 ST; S=10	2	· ·		19999	816701	2.45%	3.06%
Dispatch 3 BST; C10 24235 872278 2.78% 10.79%		Residence	,				
Section Sect			,				
Residence Circuits							
A	3		i i	24235	872278	2.78%	10.79%
Residence Circuits; Dispatch	L						
Dispatch S BST; S=10 4834 O DIV/O N/A	4	,		11	101	10.89%	9.80%
5 BST; Residence >=10 Circuits; Non- Dispatch 4834 0 DIV/0 N/A 6 BST; Residence >=10 Circuits 4845 101 4797.03% 9.80% 7 BST; Business <10 Circuits; Dispatch 1089 Circuits; Non- Dispatch 16483 6.61% 6.86% 8 BST; Business <10 Circuits; Non- Dispatch 2166 56070 3.86% 4.36% 9 BST; Business <10 Circuits; Non- Dispatch 3255 Dispatch 72553 4.49% 11.21% 10 BST; Business >=10 Circuits; Non- Dispatch 279 Circuits; Non- Dispatch 487 57.29% 0.41% 12 BST; Business >=10 Circuits 329 Circuits 940 35.00% 7.66% 13 BST; Design <10 Circuits; 81 6289 1.29% 2.35%		Residence					
Residence Circuits; Non-Dispatch							
Non-Dispatch ST; S=10 4845 101 4797.03% 9.80%	5			4834	0	DIV/0	N/A
Dispatch Circuits Sesidence Sesi		Residence					
6 BST; Residence >=10 Circuits 4845 101 4797.03% 9.80% 7 BST; Business <10 Circuits; Dispatch 1089 16483 6.61% 6.86% 8 BST; Business <10 Circuits; Non- Dispatch 2166 56070 3.86% 4.36% 9 BST; Business <10 Circuits 3255 72553 4.49% 11.21% 10 BST; Business >=10 Circuits; Dispatch 50 453 11.04% 7.25% 11 BST; Business >=10 Circuits; Non- Dispatch 279 487 57.29% 0.41% 12 BST; Business >=10 Circuits 329 940 35.00% 7.66% 13 BST; Design <10 Circuits; 81 6289 1.29% 2.35%							
Residence Circuits 7 BST; Business <10							
7 BST; Business <10 Circuits; Dispatch	6	,	·	4845	101	4797.03%	9.80%
Circuits; Dispatch				1000			5 7 50 4
Dispatch S BST; Business <10 2166 56070 3.86% 4.36%	7	BST; Business	-	1089	16483	6.61%	6.86%
8 BST; Business <10							
Circuits; Non-Dispatch		DOT D		2166	56070	2.000/	4.260/
Non-Dispatch Page	8	BS1; Business		2166	36070	3.86%	4.36%
Dispatch 9 BST; Business <10 3255 72553 4.49% 11.21%							
9 BST; Business <10					i		
Circuits	0	DCT: Dusings		2255	72552	4.400/	11 210/
Description Section	9	DS1; Dusiness		3233	12333	4.49%	11.2170
Circuits; Dispatch	10	BCT: Business		50	152	11 0494	7 250/
Dispatch	10	DS1, Dusiness		30	433	11.0476	7.2370
11 BST; Business >=10 279 487 57.29% 0.41% Circuits; Non- Dispatch Non- Dispatch 329 940 35.00% 7.66% 12 BST; Business >=10 Circuits 329 940 35.00% 7.66% 13 BST; Design <10 Circuits; 81 6289 1.29% 2.35%							
Circuits; Non- Dispatch	11	RST: Rucinace		270	487	57 20%	0.41%
Non- Dispatch 12 BST; Business >=10 329 940 35.00% 7.66%	11	Do1, Dusiness	1	213	707	31.2370	0.71/0
Dispatch							
12 BST; Business >=10 329 940 35.00% 7.66% 13 BST; Design <10							
Circuits	12	BST: Business		329	940	35.00%	7.66%
13 BST; Design <10 81 6289 1.29% 2.35% Circuits;					710	22.3070	//
Circuits;	13	BST: Design		81	6289	1.29%	2.35%
			Dispatch				

	Measurement	Category	KPMG Consulting - Calculated	KPMG Consulting- Calculated Denominator	KPMG Consulting - Calculated	BellSouth Reported Value
100			Numerator		Value	
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%
15	CLEC;	<10	84	1035	8.12%	7.92%
	Residence	Circuits;		1000	31.270	, 13 = 70
	,	Dispatch				
16	CLEC;	<10	594	14248	4.17%	4.41%
	Residence	Circuits;				
		Non-				
		Dispatch				
17	CLEC;	<10	678	15283	4.44%	12.33%
	Residence	Circuits				
18	CLEC;	>=10	25	0	DIV/0	N/A
1	Residence	Circuits;				
		Non-				
		Dispatch				
19	CLEC;	>=10	25	3	833.33%	N/A
	Residence	Circuits				
20	CLEC;	<10	27	431	6.26%	7.19%
	Business	Circuits;				
-	~~~	Dispatch			4 6004	
21	CLEC;	<10	112	2387	4.69%	5.01%
	Business	Circuits;				
		Non-				
22	CLEC;	Dispatch <10	139	2818	4.93%	12.21%
22	Business	Circuits	139	2010	4.3370	12.21/0
23	CLEC;	>=10	5	6	83.33%	16.67%
2.5	Business	Circuits;	5		05.5570	10.0770
	Dasmoss	Dispatch				
24	CLEC;	>=10	4	13	30.77%	7.69%
	Business	Circuits;	•			
		Non-				
		Dispatch				
25	CLEC;	>=10	9	19	47.37%	24.36%
	Business	Circuits				
26	CLEC; Design	<10	1	83	1.20%	1.89%
L		Circuits				
27	CLEC; UNE	<10	31	1245	2.49%	13.64%
	Design	Circuits;				
		Dispatch	: :	<u></u>		

	Measurement	Category	KPMG Consulting - Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting - Calculated Value	BellSouth Reported Value
28	CLEC; UNE	<10	31	1245	2.49%	13.64%
	Design	Circuits				
29	CLEC; UNE	<10	14	1048	1.34%	1.43%
	Non-Design	Circuits;				
}		Non-				
		Dispatch				
30	CLEC; UNE	<10	14	1582	0.88%	1.43%
	Non-Design	Circuits				
31	CLEC; UNE	>=10	1	26	3.85%	N/A
	Non-Design	Circuits;				
		Non-				
		Dispatch				
32	CLEC; UNE	>=10	1	49	2.04%	N/A
	Non-Design	Circuits				

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth 2nd Amended Response:

The changes that were originally planned for the June 1st production run (May data) were not implemented. They are scheduled for the July 1st production run (June data).

BellSouth 3rd Amended Response:

The changes that were planned for the July 1st production run (June data) were not implemented. The changes are targeted to be effective for July data.

⁴ BellSouth's Response to Observation 32, 01/31/01.



BellSouth Florida OSS Testing Evaluation

Date: March 22, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.



Florida OSS Test Exception 37

April 18, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

BellSouth Response:

BellSouth Billing & Collections Operations has an existing formal process to address work force capacity planning in the Billing Work Center. Private and proprietary information regarding this process is provided to KPMG in a separate attachment. Work force capacity planning documents were provided 9/7/00 to Carol Matlak at KPMG as part of PPR7 and PPR8 process tests.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.



Florida OSS Test Exception 37

June 14, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

BellSouth Response:

BellSouth Billing & Collections Operations has an existing formal process to address work force capacity planning in the Billing Work Center. Private and proprietary information regarding this process is provided to KPMG in a separate attachment. Work force capacity planning documents were provided 9/7/00 to Carol Matlak at KPMG as part of PPR7 and PPR8 process tests.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.

BellSouth Amended Response:

BellSouth does utilize force-sizing models in its capacity management process for the Local Billing & Collections center. During an interview in the Local Billing & Collections center for PPR10, incorrect information was provided to KPMG. The BellSouth employee KPMG interviewed is neither the owner nor the direct recipient of the force-sizing model used in the force staffing process. There is a formal model in place that has been used for some time to drive force levels.

Output data from the LCSC Ordering Force Model is used as input for the Local Billing & Collections center force-sizing model. A description of the input and output data for the force-sizing model process has been included with the force model. A copy of the proprietary force-sizing model has been attached for KPMG to review. KPMG may refer to BellSouth's response to Exception 48 for additional information regarding the overall staffing process.